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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,
Plaintiff,

vs.

MATTHEW JOHN CANNON,

Defendant.

CASE NO: 2:19-cr-025-RFB-VCF

**STIPULATION TO WAIVE DISCLOSURE
REQUIREMENTS OF FED. R. CRIM. P.
32, AND LCR 32-1.**

IT IS HEREBY STIPULATED AND AGREED by and through NICHOLAS TRUTANICH, United States Attorney, PETER S. LEVITT, Assistant United States Attorney, and defendant MATTHEW CANNON, by and through his counsel LUCAS J. GAFFNEY, ESQ., that the parties waive the disclosure requirements mandated by Fed. R. Crim. P. 32 and LCR 32-1 for the purpose of expediting the Defendant's sentencing.

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The instant the Stipulation is entered into for the following reasons:

1. On August 13, 2020, the Court conducted a Change of Plea Hearing for Defendant, MATTHEW CANNON [ECF 81]. At the hearing's conclusion CANNON requested an expedited sentencing date. The Court granted CANNON's request and scheduled sentencing for October 15, 2020.
2. In order to accommodate the expedited sentencing date, the parties stipulate to waive the disclosure requirements contained in Federal Rule of Criminal Procedure 32, and United States District Court of Nevada Local Criminal Rule 32-1, which mandate the United States probation officer disclose CANNON's presentence investigation report ("PSR") to the parties at least 35 days before sentencing.
3. Counsel has contacted United States Probation Officer Sunny Cascio who is assigned to drafting Cannon's PSR. Ms. Cascio indicated she shall make every effort to disclose Cannon's PSR no later than ten (10) days before Cannon's sentencing hearing.
4. Counsel has spoken to MATTHEW CANNON who is in custody and he does not object to waiving the aforementioned disclosure requirements.
5. Counsel has spoken to AUSA PETER LEVITT, who does not object to waiving the aforementioned disclosure requirements.

DATED: August 20, 2020.

Respectfully submitted,

/s/ Lucas Gaffney

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/s/ Peter Levitt

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Attorney for the United States of America

ORDER

IT IS SO ORDERED



RICHARD F. BOULWARE, II
UNITED STATES DISTRICT JUDGE

DATE: September 3, 2020.